

Honorable Mary Jo Heston
Misc. Proceeding

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON**

UNITED STATES TRUSTEE

Plaintiff,

v.

THOMAS MCAVITY, and NORTHWEST
DEBT RELIEF LAW FIRM,

Defendants.

Misc. P. No. 20-00400-MJH

STIPULATION TO CONTINUE TRIAL
DATE

Acting United States Trustee for Region 18, Gregory M. Garvin (“U.S. Trustee”), by and through his attorney, Matthew J.P. Johnson, and Thomas McAvity, by and through his attorney Daniel Garrison, hereby stipulate and agree as follows:

The U.S. Trustee has served upon the Defendant his first set of interrogatories and requests for production (the “RFPs”). The RFPs seek production of a large volume of documents going back approximately two years. Given the large volume of documents requested, the United States Trustee and Debtor’s attorney have conferred several times about the production of discovery, the last time being by email on December 21, 2020. The parties have agreed to allow Defendants until January 15, 2021, to complete discovery. Based on this extended discovery timeline, the parties would also like to continue the trial date, and the corresponding deadlines.

STIPULATION

Office of the United States Trustee
700 Stewart St., Suite 5103
Seattle, WA 98101-1271
Phone: 206-553-2000,
Fax: 206-553-2566

1 The UST contacted chambers on or around December 7, 2020, seeking a new trial date
2 and was informed by the Courtroom Deputy, Patty Adams, that Judge Heston had available trial
3 dates on June 14, 2021, through June 18, 2021. Therefore, the parties to this stipulation agree that
4 the trial should be moved to June 14, 2021, through June 17, 2021.

5
6 Agreed to by:

7 /s/ Daniel Garrison

8 Daniel Garrison, AZ Bar #021495

Admitted *Pro Hac Vice*

9 Attorney for Thomas McAvity and Northwest Debt Relief Law Firm

10 Agreed to by:

11
12 /s/ Matthew J.P. Johnson

Matthew J.P. Johnson, WSBA #40476

13 Attorney for the United States Trustee

14
15
16 VERIFICATION

17
18 The undersigned, Thomas McAvity, Defendant in this adversary case, hereby certify that I have
19 read the foregoing Interrogatories and Requests for Production and the answers and responses
20 thereto, and the answers and responses are true, correct, and complete to the best of my knowledge
21 and belief.
22

STIPULATION

Office of the United States Trustee
700 Stewart St., Suite 5103
Seattle, WA 98101-1271
Phone: 206-553-2000,
Fax: 206-553-2566

1
2 I certify under penalty of perjury that the foregoing is true and correct.

3
4 Executed on _____, 2020.

5
6 _____
7 Thomas McAvity
8 Defendant

9 DATED this Thursday, January 7, 2021,

10 Respectfully submitted,

11 Gregory M. Garvin
12 Acting U.S. Trustee for Region 18

13 /s/ Matthew J.P. Johnson
14 Matthew J.P. Johnson, WSBA #40476
15 Attorney for the United States Trustee
16
17
18
19
20
21
22

STIPULATION

Office of the United States Trustee
700 Stewart St., Suite 5103
Seattle, WA 98101-1271
Phone: 206-553-2000,
Fax: 206-553-2566